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10 Attorney for Defendant
11 XAVIER ROBERTS

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,) Case No: 2:24-CR-0309-WBS
17 Plaintiff,)
18 vs.)
19 XAVIER ROBERTS,) STIPULATION AND ORDER TO CONTINUE
20 Defendant.) STATUS CONFERENCE AND EXCLUDE
21) TIME
22) District Judge William B. Shubb
23) New Date: April 21, 2025
24) Time: 10:00 a.m.
25)
26)
27)
28)

16 IT IS HEREBY STIPULATED and requested by and between the parties through their
17 respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the
18 UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS,
19 that the status conference currently set for Tuesday, February 18, 2025, be continued to Monday,
20 **April 21, 2025 at 10:00 a.m.**, and that time be excluded for preparation of counsel.

21 The Government has provided hundreds of documents and dozens of video files for
22 Defense counsel's review in this case. Since the start of the case, Defense counsel has been
23 reviewing and analyzing the above, conducting legal research, meeting with her client, and
24 otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional
25 time to review discovery, discuss the case with her client and the Government, and continue to
26 prepare. The parties believe that failure to grant the requested continuance would deny defense
27 counsel the reasonable time necessary for effective preparation, taking into account the exercise
28 of due diligence.

Accordingly, the parties stipulate and request that the Court exclude time between the date of the filing of this stipulation through the new status conference date of April 21, 2025, under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

Date: February 11, 2025

HEATHER E. WILLIAMS
Federal Defender

/s/ Rachelle Barbour
RACHELLE BARBOUR
Attorney for Defendant
XAVIER ROBERTS

Date: February 11, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Heiko Coppola
HEIKO COPPOLA
Assistant U.S. Attorney
Attorney for the United States

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

Dated: February 12, 2025

William B. Shubb
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE